REMARKS

The Applicant hereby submits the present Request For Reconsideration for the above-referenced patent application in response to the Office Action mailed on 28 March 2006. In the present Request, no claims have been amended, canceled, or added. Therefore, claims 1-25 remain pending in the present application.

In the Office Action of 28 March 2006, the Examiner maintained objection to the Title as not being descriptive. In response, the Applicant amends the title in accordance with the Examiner's suggestion ("Decorative Lights With Addressable Color-Controllable LED Nodes And Control Circuitry, And Method") to reduce the issues and expedite allowance of the application. Therefore, the concern raised by the Examiner regarding the Title should now be overcome.

In the same Office Action, the Examiner rejected claims 1-25 as being unpatentable under 35 U.S.C. § 103(a) over KRAMER (U.S. Patent No. 3,789,211), KAZAR (U.S. Patent No. 5,008,595), and LOWE et al. (U.S. Patent No. 6,424,096). In response, the Applicants respectfully submit that the claims 1-25 as amended are allowable over the prior art of record for at least the following reasons.

To establish a prima facie case of obvious under 35 U.S.C. § 103(a), the prior art references in combination **must teach or suggest each and every limitation** of the claims. In addition, there **must be an adequate suggestion or motivation to combine** the teachings of the combined references.

KRAMER and KAZAR Fail To Teach Or Suggest A Memory, As Well As A Memory For Storing Data For A Plurality Of Color Schemes. In the Office Action, the Examiner asserts that KRAMER discloses a memory as well as a memory for storing data for color schemes. See e.g. pages 12 and 17 of the Office Action of 28 March 2006. To support this assertion, the Examiner identifies no specific location in KRAMER and

articulates **nothing** other than the word "inherent". As apparent, the Examiner believes that KRAMER inherently discloses a memory and a memory for storing data for color schemes.

In response, the Applicants respectfully disagree and submit that the Examiner has failed to make an adequate showing of "memory" in KRAMER. Recall that, for a proper § 103 rejection, the prior art references in combination **must teach or suggest each and every limitation** of the claims. The Examiner cannot invent components in the prior art references that do not exist. The Applicants respectfully submit that KRAMER does not teach or suggest a memory and a memory for storing color data. As one ordinarily skilled in the art will appreciate, a memory refers to a digital component to which digital data can be written and read back from by a computer device at specific addresses. Nothing of the sort exists in KRAMER, which merely teaches only discrete components of a plurality of self-modulating half-wave phase control circuits.

Further, the Examiner has failed to articulate an inherency argument in KRAMER. "In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherency characteristic <u>necessarily</u> flows from the teachings of the applied prior art." *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original). On the contrary, the Examiner has articulated nothing with respect to the alleged inherency in KRAMER. Therefore, the Examiner has failed to make a prima facie case of obviousness in the First Office Action and the Final Office Action.

The Examiner further asserts that KAZAR has a memory and a memory for storing data for the claimed color schemes. See e.g. pages 5, 14, and 15 of the Office Action of 28 March 2006. Again, the Applicants respectfully disagree and submit that the Examiner has failed to make an adequate showing of "memory" or "memory for storing holiday color data" in the prior art. Recall that, for a proper § 103 rejection, the prior art references in combination **must teach or suggest each and every limitation** of

the claims. The Examiner cannot invent components in the prior art references that do not exist.

The Examiner believes that KAZAR inherently discloses a memory and a memory for storing color scheme data. However, the Examiner has failed to articulate any inherency argument in KAZAR for memory and stored color data for claims 1-7, 13, and 20-25. "In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherency characteristic necessarily flows from the teachings of the applied prior art." *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original). On the contrary, the Examiner has articulated nothing with respect to the alleged inherency in KAZAR in relation to its memory and stored color schemes in memory for these claims. Therefore, the Examiner has failed to make a prima facie case of obviousness in the First Office Action and the Final Office Action.

The Applicants respectfully submit that KAZAR does not teach or suggest a memory or a memory for storing a plurality of color schemes. As one ordinarily skilled in the art will appreciate, a memory refers to a digital component to which digital data can be written and read back from by a computer device at specific addresses. Nothing of the sort exists in KAZAR.

Only with reference to claims 15 and 19, the Examiner indicates that the memory is "inherent as it is required for the disclosed PAL IC to function" (see page 15 of Office Action) and that the possible combinations of color schemes are "inherent, as it refers to desired functions programmed into the disclosed PAL IC" (see page 15 of Office Action). Further, the Examiner makes reference to a Programmable Array Logic (PAL) IC (IC2) 101 of KAZAR at column 5 at lines 24-29 and FIG. 2. With respect to the Examiner's assertions for claims 15 and 19, the Applicants respectfully disagree. IC2 101 of KAZAR is a Programmable Array Logic (PAL) which is programmed by the circuit designer as a timing circuit. This timing circuit is designed specifically to produce the required repeated sequenced clock signals in FIG. 6 as SIG1, SIG2, SIG3, and SIG4 on all channels. As apparent, the timing circuit of the PAL IC is not a memory and not a

memory for storing a plurality of holiday color schemes. Indeed, a typical PAL offers logic functions and the logic is programmable, being especially useful in designing circuits. However the PAL IC and the timing circuit of KAZAR are not digital components to which digital data can be written and read back from by a computer device at specific addresses.

The Examiner asserts that a memory is required for the PAL IC of KAZAR to function. The Examiner further asserts that the desired functions for the color schemes are programmed into the PAL IC. The Applicants respectfully disagree. For one, the timing circuit of KAZAR appears to operate independently with a clock circuit (component 103) without any need for memory as the Examiner suggests. It repeatedly produces the SIG1, SIG2, SIG3, and SIG4 signals shown in FIG. 6 of KAZAR, as it should, without any memory. The Examiner provides no evidence or argument otherwise. Speculating further, even if the user could use a special separate computer programming device with memory to program logic functions into a PAL IC of a decorative lighting apparatus in this case, this would not be an everyday, practical way in which to provide different color schemes for the lighting apparatus. Such a decorative lighting apparatus would not even provide different color schemes in response to a different user switch setting of a decorating selector. There further is no technical support or enablement in KAZAR for providing different timing schemes within the PAL IC to support different color schemes in response to different user switch settings of a decorating selector.

"Inherency ... may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Circ. 1999). Further, "[i]n relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherency characteristic <u>necessarily</u> flows from the teachings of the applied prior art." *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original).

Again, as apparent, the Examiner has failed to make a prima facie case of obviousness in the First Office Action and the Final Office Action with respect to such limitations.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

KRAMER And KAZAR Fail To Teach Or Suggest The Use Of Addressable Color-Controllable RGB LED Nodes In A Year-Round Type Apparatus And Method As Claimed. In the present case, KRAMER and KAZAR fail to teach or suggest "addressable color-controllable RGB LED nodes" as recited in the claims. An addressable color-controllable RGB LED node is properly interpreted as an RGB LED node that is accessible via a computer address, as in computer addressable memory, illuminated with an appropriate color by sending appropriate color data over data lines to the address associated with the node.

The Applicants respectfully acknowledge the Examiner's duty to interpret the claims as broadly as is reasonable. The Applicants respectfully submit, however, that the Examiner's asserted interpretation of the claim limitations for "addressable color-controllable RGB LED node" is unreasonable and inconsistent with both the specification and to those skilled in the art. During patent examination, the claims must be given their broadest reasonable interpretation consistent with the specification. See e.g. *In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000). The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach. *In re Cortright*, 165 F.3d 1353, 1359, 49 USQ2d 1464, 1468 (Fed. Cir. 1999).

In the Applicant's previous response, it was asserted that the reasonable interpretation of "addressable color-controllable RGB LED node" involved a node that was "addressable" as in accessible via a computer address (i.e. computer addressable memory), and that "[a]ny broader interpretation of the term 'addressable color-controllable RGB LED nodes" in the claims would not be a reasonable interpretation"

(see e.g. page 16 at lines 7-8 of the Amendment of 17 January 2006). The Applicants submitted two examples of definitions of such term from dictionary sources ("capable of being addressed; 'addressable memory'" *and* "accessible through an address, as in computer memory"). Also, in the present application on page 7 at lines 13-17, for example, it is described that "each color-controllable RGB LED along the plurality of wires 106 is embodied at a node which is addressable and may be illuminated with an appropriate color by sending appropriate color data over data lines to an address associated with the node. The color mixing techniques are utilized locally at each node with its corresponding RGB LED to provide for a variety of colors other than red, green, and blue (e.g. orange, yellow, white, etc.). In FIGS. 1-2, each LED node is identified with a particular address represented by L1, L2, L3, L4, etc."

When read in context with the remaining part of the claim, the terminology "addressable color-controllable LED nodes" is even clearer. Method claim 1, for example, recites the step of "**sending the holiday color data over one or more data lines** to addressable color-controllable LED nodes **associated with LED node address data**. See e.g. *Chef America, Inc. v. Lamb-Weston, Inc.*, 358 F.3d 1371, 1372, 69 USPQ2d 1857 (Fed. Cir. 2004) ("absent any indication that their use in a particular context changes their meaning...").

Thus, it is clear that an addressable color-controllable RGB LED node is an RGB LED node that is "addressable" as in accessible via a computer address (i.e. as in computer addressable memory), and illuminated with an appropriate color by sending appropriate color data over data lines to the address associated with that node. As apparent, the Applicants' interpretation relates not only to the terminology "addressable color-controllable RGB LED nodes" per se, but also to related terminology such as in the step of sending color data over one or more data lines to addressable color-controllable RGB LED nodes associated with LED node address data.

With the proper claim interpretation in mind, it is clear that the KRAMER and KAZAR fail to teach such addressable color-controllable RGB LED nodes. **KRAMER merely teaches incandescent colored lamps connected to AC lines which provide**

electrical power to each lamp. In KRAMER, no computer-type addressing is used at each lamp, and no data selected from the memory is sent over one or more data lines to an address of the lamp to control its color. In fact, the teachings in KRAMER don't even come close to that which is claimed in the present application. As provided for in the Summary Of The Invention of KRAMER, it is stated that:

> "The control means controls the **power through each of the channels** in an independent and random fashion between on and off. Each lamp load is caused to slowly **increase or decrease in intensity** between on and off **in response to its respective channel.**

As illustrated in FIGs. 2 and 3 of KRAMER, the AC power source is coupled directly to the lamps. These are AC power lines, not data lines. See also column 6 at lines 24-27 of KRAMER:

> three strings of colored light bulbs capable of radiating light when **triggered on by a flow of power therethrough**

Finally, see FIG. 6 and the description thereof in column 4 of KRAMER, which graphically illustrates the primary basis for the KRAMER patent:

> To better illustrate the dynamic color concept, FIG. 6 show three graphs, 24A, 24B and 24C depicting a typical display of **intensity versus time for the three channel system 18**, each graph corresponding to a channel 10A, B or C. It may be seen that **light intensity and the phase firing of each channel are continuously varying with time.**

As apparent in KRAMER, electrical power is supplied through the wires to incandescent bulbs – which is <u>not</u> data sent to addressable color-controllable LED nodes over one or more data lines. Also apparent is that, to modify the teachings of KRAMER would be to completely alter the intent and intended operation of KRAMER (see "THREE CHANNEL PHASE CONTROL SYSTEM" in column 3 of KRAMER).

Similarly, KAZAR fails to teach or suggest such nodes and limitations. **KAZAR teaches the use of bi-color LEDs which are connected to lines which provide electrical power to enable each bi-color LED.** One skilled in the art would not characterize the bi-color LEDs of KAZAR as addressable color-controllable RGB LED nodes, to which color data is sent to over one or more data lines, as properly construed and read in context of the claims. In KAZAR, no computer-type addressing is used at each bi-color LED, and no data selected from the memory is sent over one or more data lines to an address of the bi-color LED to control its color. With respect to such limitations, the Examiner makes reference to FIG. 13 of KAZAR. The description of FIG. 13, however, has the same or similar deficiencies as the KRAMER reference. See e.g. column 8 at lines 45-58 of KAZAR:

> **Conductors** CH1 or CH2 or CH3 or CH4, **when individually powered from the controller/multiplexer**, form a complete circuit with the RET conductor. Both the CH conductors or the RET conductor **can supply power** and the other be the ground return line depending on which color diode, red or green, is selected by the controller. Only one of the CH **conductors will be under power** at any point in time.

Thus, KAZAR fails for similar reasons.

In the Office Action, the Examiner generally asserts that KRAMER and KAZAR teach light circuit components "in an arrangement broadly considered by the Examiner as an addressable circuit arrangement." However, the Applicants do not claim "an addressable circuit arrangement." Instead, the Applicants claim "a plurality of addressable color-controllable LED nodes" where each node is addressable and illuminated with an appropriate color by sending appropriate color data over data lines to an address associated with the node. Color mixing techniques are performed locally at each node.

As apparent, it is clear to one ordinarily skilled in the art that neither KRAMER nor KAZAR teach or suggest the recited limitations of "addressable color-controllable RGB LED nodes". Any broader interpretation of the term "addressable color-controllable RGB LED nodes" in the claims would not be a reasonable interpretation, in

light of this term's plain and ordinary meaning and consistency with the patent application.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

KRAMER And KAZAR Fail To Teach Or Suggest The Use Of Color Data That is Selected From Memory And Subsequently Sent Over One Or More Data Lines To Addressable Color-Controllable RGB LED Nodes, In A Year-Round Type Apparatus And Method As Claimed.

Claim limitations of the present application recite steps such as "sending the color data over one or more data lines to addressable color-controllable RGB LED nodes associated with LED node address data." Such color data is previously selected from the memory, for a color scheme associated with the user-selectable switch setting. None of these features are taught or suggested by KRAMER and KAZAR. Without an adequate teaching of a memory and adequate teaching of addressable color-controllable RGB LED nodes, it is difficult to understand how KRAMER and KAZAR could teach these further limitations. With the proper claim interpretation in mind, it is clear that the KRAMER and KAZAR fail to teach selection of the color data from memory and sending that color data over one or more data lines.

KRAMER merely teaches incandescent colored lamps connected to AC lines which provide electrical power to each lamp. In KRAMER, no computer-type addressing is used at each lamp, and no data selected from the memory is sent over one or more data lines to an address of the lamp to control the color. In fact, the teachings in KRAMER don't even come close to that which is claimed in the present application. As provided for in the Summary Of The Invention of KRAMER, it is stated that:

> "The control means controls the **power through each of the channels** in an independent and random fashion between on and off. Each lamp load is caused to slowly **increase or decrease in intensity** between on and off **in response to its respective channel.**

As illustrated in FIGs. 2 and 3 of KRAMER, the AC power source is coupled directly to the lamps. These are AC power lines, not data lines. See also column 6 at lines 24-27 of KRAMER:

> three strings of colored light bulbs capable of radiating light when **triggered on by a flow of power therethrough**

Finally, see FIG. 6 and the description thereof in column 4 of KRAMER, which graphically illustrates the primary basis for the KRAMER patent:

> To better illustrate the dynamic color concept, FIG. 6 show three graphs, 24A, 24B and 24C depicting a typical display of **intensity versus time for the three channel system 18**, each graph corresponding to a channel 10A, B or C. It may be seen that **light intensity and the phase firing of each channel are continuously varying with time.**

As apparent in KRAMER, electrical power is supplied through the wires to incandescent bulbs – which is <u>not</u> data sent to addressable color-controllable LED nodes over one or more data lines. Also apparent is that, to modify the teachings of KRAMER would be to completely alter the intent and intended operation of KRAMER (see "THREE CHANNEL PHASE CONTROL SYSTEM" in column 3 of KRAMER).

Similarly, KAZAR fails to teach or suggest such nodes and limitations. **KAZAR teaches the use of bi-color LEDs which are connected to lines which provide electrical power to enable each bi-color LED.** One skilled in the art would not characterize the bi-color LEDs of KAZAR as addressable color-controllable RGB LED nodes, to which color data is selected from memory and sent to over one or more data lines, as properly construed and read in context of the claims. In KAZAR, no computer-type addressing is used at each bi-color LED, and no data selected from the memory is sent over one or more data lines to an address of the bi-color LED to control its color. With respect to such limitations, the Examiner makes reference to FIG. 13 of KAZAR. The description of FIG. 13, however, has the same or similar deficiencies as the KRAMER reference. See e.g. column 8 at lines 45-58 of KAZAR:

> **Conductors** CH1 or CH2 or CH3 or CH4, **when individually powered from the controller/multiplexer**, form a complete circuit with the RET conductor. Both the CH conductors or the RET conductor **can supply power** and the other be the ground return line depending on which color diode, red or green, is selected by the controller. Only one of the CH **conductors will be under power** at any point in time.

Thus, KAZAR fails for similar reasons.

KRAMER and KAZAR Fail To Teach Or Suggest A Decorating Selector Which Provides A Plurality Of User-Selectable Switch Settings. In the Office Action, the Examiner asserts that KAZAR discloses a decorating selector which provides a plurality of user-selectable switch settings. See e.g. page 6 of the Office Action of 28 March 2006. To support this assertion, the Examiner identifies column 3 at lines 6-12 ad column 5 at lines 24-29.

In response, the Applicants respectfully disagree and submit that the Examiner has failed to make an adequate showing of "decorating selector" and "which provides a plurality of user-selectable switch settings" in the prior art. Recall that, for a proper § 103 rejection, the prior art references in combination **must teach or suggest each and every limitation** of the claims. The Examiner cannot invent components in the prior art references that do not exist. The Applicants respectfully submit that KAZAR does not teach or suggest a decorating selector which provides a plurality of user-selectable switch settings.

Further, the Examiner has failed to articulate any inherency argument in KAZAR. "In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherency characteristic <u>necessarily</u> flows from the teachings of the applied prior art." *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original). On the contrary, the Examiner has articulated nothing with respect to any alleged inherency in KAZAR. Therefore, the Examiner has failed to make a prima facie case of obviousness in the First Office Action and the Final Office Action.

The Applicants respectfully submit that KAZAR fails to sufficiently disclose "a decorating selector which provides a plurality of user-selectable switch settings" in order "to illuminate addressable color-controllable RGB LED nodes along the decorative light strand with a different holiday color scheme for each user-selectable switch setting." The specification and drawings of KAZAR reveal no selector or switch, or any mechanism to process such selector or switch to cooperate with the circuitry of KAZAR; no enablement for such limitations exist. KAZAR teaches **no** decorating selector/switch connected to **no** interface connected to **no** circuits connected to **no** interface to the LEDs, and **no** plurality of user-selectable switch settings. There may be undue experimentation involved in designing the appropriate switches and connections involved for such task (e.g. see the PAL IC in FIG. 2 and associated text). In any event, KAZAR fails to teach the public any such mechanism.

On the other hand, KAZAR does mention in passing in column 3 at lines 6-12 that a user may be allowed "to select individual lights to be constantly illuminated or flash in response to an oscillating voltage source." However, this passage for selecting whether lights are constantly illuminated or flashing appears to describe a conventional controllable flashing technique (not color scheme control technique) which is not the specific focus of the present application. KAZAR further mentions in passing that it may alternatively "allow multicolor patterns to be generated". However, techniques to achieve eye-catching time-sequenced multicolor lighting effects (time-sequenced chase lights, wave patterns, etc.) is also not the specific objective of the present application. Also, although it may be possible to redesign the circuit of KAZAR to allow for a different multicolor pattern, this is outside the scope of that which is claimed. The focus of the present application relates to providing specific holiday color schemes with specific color combinations useful to end users for different holidays or occasions throughout the year using addressable color-controllable RGB LED nodes, with use of a decorator selector which provides a plurality of user-selectable switch settings.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

The Claim Invention Is Patentable For Reasons Which Include Providing Multiple Holiday Color Schemes For Year-Round Type Lighting Usage. The Examiner further argues that the claimed holiday color scheme limitations relate to ornamentation only with no mechanical function, which cannot be relied upon to patentably distinguish from the prior art, and cites In re Seid, 161 F.2d 229, 73 USPQ 431 (CCPA 1947).

In response, the Applicants respectfully disagree with the Examiner's argument. For one, the courts have subsequently rejected such overgeneralized rejections and determinations, as in Ex parte Hilton, 148 USPQ 356 (Bd. App. 1965) and In re Dembiczak, 175 F.3d 994, 50 USPQ2d 1614 (Fed. Cir. 1999). In addition, the claims do not merely recite some vague form of "ornamentation" – but rather concrete elements and functionality for achieving a desired advantage: a decorative lighting apparatus having year-round use and functionality. For example, the claims recite "memory for storing **data for a plurality of holiday color schemes**, each holiday color scheme associated with one or more **different holiday colors**"; and "sending the **holiday color data** over one or more data lines to addressable color-controllable RGB LED nodes associated with LED node address data" for each user-selectable switch setting. Finally, the Applicants previously identified evidence that the resulting apparatus provides an advantage from the public's perspective, in the form of the newspaper article "Lights Go Up, Never Come Down" from the Chicago Sun-Times. The public response was enthusiastic. As apparent, the claimed limitations regarding holiday color schemes touch upon more than just mere ornamentation without further functionality or utility.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

There Is No Adequate Suggestion Or Motivation Provided To Combine The Teachings To Demonstrate Any Obviousness. The Applicants also respectfully submit that there is no adequate suggestion or motivation to combine the teachings of the prior art. For example, KRAMER teaches away from the modifications suggested by the

Examiner. In particular, KRAMER cannot be modified as suggested to teach that which is claimed, as the modification is against the primary intent of KRAMER.

The primary intent of KRAMER is to produce a decorative lighting system with *special lighting effects*: dynamically changing colored lights. More specifically, the primary intent of KRAMER is to produce a decorative lighting system where colors are **dynamically** and **randomly** and **independently changing over time**. The circuits of KRAMER are specifically configured to provide such dynamically changing colors over time for a special effect. Special lighting effects specifically addressed in KRAMER have been an important part of the excitement and sales of *Christmas* lights. The lights of KRAMER are controlled by the control means in "an **independent** and **random** fashion between on and off" (see KRAMER 1:38-40, Emphasis Added) or alternatively to display "a gradual dynamically changing mono-color light." If the teachings of KRAMER were modified as the Examiner suggests, the goal of generating **independent and random colors over time** of KRAMER would be defeated.

For example, if a particular holiday color scheme in KRAMER's system were to be selectable by the end user, this would fly in the face of KRAMER's intent as being **controllable and predetermined (as opposed to independent and random, the objective in KRAMER)**.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

The Examiner's Suggested Combination Under Section 103 Assumes Way Too Much. Neither KRAMER nor KAZAR teach the use of RGB LEDs or RGB LED nodes. The Applicants claim the use of "addressable color-controllable RGB LED nodes." To provide this additional teaching, the Examiner takes Official Notice that the use of LEDs is old and well known in the illumination art. Thus, this essential is an entirely new combination, asserting overall that an "RGB LED node" is essentially taught or obvious in the prior art. However, the designs of KRAMER and KAZAR are very different. KRAMER utilizes incandescent lamps in series, whereas KAZAR utilizes bi-polar, bi-

color LEDs in parallel. The use of such bi-polar bi-color LED arrangement in KAZAR (see e.g. FIG. 10 of KAZAR) is important to achieve multi-color special effects (see e.g. column 7 at lines 28-37 of KAZAR). It is completely unclear as to what the resulting product or function could be, with KRAMER's series incandescent lamps, KAZAR's bi-polar, bi-color LEDs in parallel, and the Examiner's new RGB LEDs. The Applicants assert that the Examiner's speculative combined teachings would result in a complete redesign. This would require too much experimentation, undue experimentation in the Applicants' view, in order for one skilled in the art to fabricate the present invention as claimed from the teachings of KRAMER and KAZAR.

For these reasons alone, the Applicants respectfully request the Examiner to withdraw the §103(a) rejections and to allow claims 1-25.

Other Reasons For Allowability. One ordinarily skilled in the art appreciates that further reasons for allowability of the claims is apparent, but these reasons are deemed moot in light of all of the reasons described above and are therefore not specifically addressed in this paper.

Based on the above, the Applicants respectfully requests reconsideration of claims 1-25. In light of the above-stated reasons, the Applicants respectfully request the Examiner to withdraw the pending objections and rejections. The Applicant respectfully submits that the application as amended is now in a condition suitable for allowance.

Thank you for your reconsideration of the application as amended. The Examiner is invited to contact the undersigned to expedite prosecution of the present application in any way.

Respectfully Submitted,

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